

## WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

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## CLEARINGHOUSE RULE 01-092

## **Comments**

[NOTE: All citations to "Manual" in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated September 1998.]

## 2. Form, Style and Placement in Administrative Code

- a. The last sentence of the department's analysis is unclear in the context of the proposed rule change. The rule doubles the number of required credits but does not change language of the current rule regarding the content of the credits. It is suggested that the department review the last sentence of its analysis for clarity and add to the analysis a precise description of what the rule does regarding the number of required credits. In this regard, is it significant that the require credits are now referred to as "semester" credits?
- b. Is it necessary to include in the rule a statement of to which applications the revision first applies? Will it apply to all applications submitted on or after the effective date of the rule or is some other initial applicability contemplated?